

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; CASEY  
KIRSCHNER; ALLCORE DEVELOPMENT  
LLC; FINBRIT HOLDINGS LLC;  
CHESHIRE VENTURES LLC; CARLETON  
NELSON; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484-LO-TCB

800 HOYT LLC,

Intervening Interpleader  
Plaintiff / Intervening  
Interpleader Counter-  
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;  
BW HOLDINGS; LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON  
DATA SERVICES, INC.,

Interpleader Defendants /  
Interpleader Counter-Plaintiffs.

**AMAZON.COM, INC.'S AND AMAZON DATA SERVICES, INC.'S  
RESPONSES TO BRIAN WATSON'S  
SECOND SET OF INTERROGATORIES TO PLAINTIFFS**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc. (“Plaintiffs” or “Amazon”) hereby serve their answers to Defendant Brian Watson’s Second Set of Interrogatories to Plaintiffs (“Interrogatories”). Amazon hereby incorporates all general and specific objections previously raised in Amazon’s Objections and Responses to Brian Watson’s Second Set of Interrogatories to Plaintiffs as if fully set forth herein.

**PLAINTIFFS’ ANSWERS TO INTERROGATORIES**

**Interrogatory No. 14:**

DESCRIBE with specificity each of YOUR meetings, including in-person, virtual, and telephone conference meetings, with the U.S. Department of Justice and/or the Federal Bureau of Investigation RELATING TO DEFENDANTS or the allegations asserted by YOU in this ACTION, including YOUR meetings with the U.S. Department of Justice on February 20 and 21, 2020, as identified in AMZ-CVL-004779, including but not limited to the following: (i) the date of each meeting; (ii) the IDENTITIES, including names and positions, of all PERSONS who attended or participated in each meeting, if known, (iii) the length of each meeting, (iv) the purpose of each meeting, (v) all topics discussed during each meeting, including but not limited to any topics RELATING TO DEFENDANTS, and what was said about each topic by each PERSON, and (vi) IDENTIFY, including by Bates No., if applicable, what DOCUMENTS or COMMUNICATIONS, if any, were shared or discussed during the meetings by YOU or the U.S. Department of Justice. If DOCUMENTS were shared between YOU and the U.S. Department of Justice and you do not have a Bates No. for the DOCUMENTS, explain in detail why the DOCUMENTS were not produced pursuant to DEFENDANTS’ discovery requests and YOUR basis for withholding such documents.

**Answer to Interrogatory No. 14:**

Amazon refers to and incorporates by reference all general and specific objections previously raised in Amazon's Objections and Responses to Brian Watson's Second Set of Interrogatories to Plaintiffs as if fully set forth herein. Subject to and without waiving its prior objections, Amazon responds as follows:

The information set out below depicts information, to the best of Amazon's information, requested by this Interrogatory related to in-person meetings between Amazon and the U.S. Department of Justice and/or the U.S. Federal Bureau of Investigation RELATING TO DEFENDANTS or the allegations asserted by Amazon in this ACTION:

- In-person meeting on February 20, 2020 at the Justin W. Williams United States Attorney's Building, 2100 Jamieson Ave., Alexandria, VA 22314 for approximately two hours to discuss issues related to Plaintiffs' understanding of Defendants' real estate kickback scheme(s). Attendees included Uzo Asonye, Samantha Bateman, Jamar Walker, Jessica Aber, Joshua Huckel, Charles Connolly, Amanda Lowe, Yousri Omar, Maria Coor, Patrick Stokes, and Lora MacDonald. The presentation focused on a deck produced to Defendants at AMZ-CVL-056615 through AMZ-CVL-056656 and documents produced to Defendants at AMZ-CVL-004087 through AMZ-CVL-004490.
- In-person meeting on February 21, 2020 at the Justin W. Williams United States Attorney's Building, 2100 Jamieson Ave., Alexandria, VA 22314 for approximately two hours to discuss issues related to additional documents relevant to the February 20, 2021 presentation. Attendees included Uzo Asonye, Samantha Bateman, Jamar Walker, Joshua Huckel, Yousri Omar, Patrick Stokes, and Lora MacDonald. The presentation focused on documents produced to Defendants at AMZ-CVL-004491 through AMZ-CVL-004778.
- In-person meeting on February 28, 2020 at the Justin W. Williams United States Attorney's Building, 2100 Jamieson Ave., Alexandria, VA 22314 that lasted approximately 45 minutes that was led by IPI to discuss issues related to IPI, including IPI's background, perspective on the investigation of Defendants, and allegations against Defendants. Attendees included Uzo Asonye, Samantha Bateman, Joshua Huckel, Matthew Lee, Nitin Sathe, Charles Connolly, Amanda Lowe, Patrick Stokes, and Lora MacDonald.

The information set out below depicts information, to the best of Amazon's information, requested by this Interrogatory related to videoconference meetings between Amazon and the U.S.

Department of Justice and/or the U.S. Federal Bureau of Investigation RELATING TO DEFENDANTS or the allegations asserted by Amazon in this ACTION other than videoconference interviews of Amazon employees by representatives of the U.S. Department of Justice and/or the U.S. Federal Bureau of Investigation:

- Videoconference meeting on June 10, 2020 via WebEx that lasted approximately an hour and a half to discuss issues related to Amazon-engaged brokers and engineers, as well as additional information identified in Amazon's internal review. Attendees included Uzo Asonye, Samantha Bateman, Jamar Walker, Joshua Huckel, Dennis Wallace, Yousri Omar, Matthew Doden, Patrick Stokes, and Lora MacDonald. The presentation focused on the deck produced to Defendants at AMZ-CVL-056062 through AMZ-CVL-056079.
- Videoconference meeting on September 30, 2020 via WebEx that lasted approximately two hours to discuss issues related to Amazon's real estate transaction-related processes, as well as additional information relevant to this matter identified by Amazon's internal review. Attendees included Jamar Walker, Samantha Bateman, Joshua Huckel, Yousri Omar, Matthew Doden, Patrick Stokes, and Lora MacDonald. The presentation focused on a deck produced to Defendants at AMZ-CVL-056445 through AMZ-056466 and documents produced to Defendants at AMZ-CVL-009300 through AMZ-CVL-009515.

With respect to the information requested by this Interrogatory related to telephone conference meetings between Amazon and the U.S. Department of Justice and/or the U.S. Federal Bureau of Investigation RELATING TO DEFENDANTS or the allegations asserted by Amazon in this ACTION and videoconference interviews of Amazon employees by representatives of the U.S. Department of Justice and/or the U.S. Federal Bureau of Investigation RELATING TO DEFENDANTS or the allegations asserted by Amazon in this ACTION, Amazon directs Defendants to the documents and communications that Amazon has already produced to Defendants, including calendar invites and email exchanges between Amazon's outside counsel, Gibson Dunn, and the U.S. Department of Justice and/or the U.S. Federal Bureau of Investigation. See AMZ-CVL-00001 through AMZ-CVL-055572.

Dated: March 2, 2022

By: s/ Michael R. Dziuban

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*Counsel for Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2022, I served the following parties the foregoing Notice of Subpoena by email and by U.S. mail to their last-known address (where noted):

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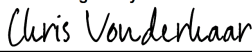
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*Counsel for Plaintiffs Amazon.com, Inc. and Amazon  
Data Services, Inc.*



VERIFICATION

I am Vice President of Infrastructure Operations at Amazon Web Services. I am authorized to make this verification on behalf of Amazon.com, Inc. and Amazon Data Services, Inc. (“Amazon”). I am familiar with the contents of Amazon’s Responses to Brian Watson’s Second Set of Interrogatories. I further declare that the facts set forth in Amazon’s Responses to Watson’s Interrogatories are true and correct to the best of my information and belief, based on my review of documents, records, and information possessed by or known to Amazon and its officers or employees, and on that basis I allege them to be true. I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct, and that I executed this Verification on March 1, 2022.

DocuSigned by:  
  
Chris Vanderhaar